

REC'D IN PRO SE OFFICE
MAY 9 25 AM 11:57

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

JENNIFER PAUYO,
Plaintiff,

v.

VERIZON FIOS and VALOR INTELLIGENT PROCESSING, LLC,
Defendants.

Civil Action No. _____

**COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF
(FAIR CREDIT REPORTING ACT & FAIR DEBT COLLECTION PRACTICES ACT)**

I. INTRODUCTION

1. Plaintiff brings this action for damages based on Defendants' violations of the Fair Credit Reporting Act ("FCRA"), 15 U.S.C. § 1681 et seq., and the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. § 1692 et seq.
2. Verizon Fios, a utility service provider, furnished inaccurate information to credit reporting agencies regarding a debt that had been sold to a third-party debt collector. Valor Intelligent Processing, LLC attempted to collect on the alleged debt without validating it, and used language and methods in violation of the FDCPA.
3. Defendants' conduct caused Plaintiff emotional distress, reputational harm, and credit damage.

II. JURISDICTION AND VENUE

4. This Court has jurisdiction pursuant to 15 U.S.C. § 1681p, 15 U.S.C. § 1692k(d), and 28 U.S.C. § 1331.
5. Venue is proper in this district under 28 U.S.C. § 1391(b), as Plaintiff resides in Brooklyn, New York, and the violations occurred within this judicial district.

III. PARTIES

6. Plaintiff JENNIFER PAUYO is a natural person and a consumer under the FCRA and FDCPA residing in Kings County, New York.

7. Defendant VERIZON FIOS is a division of Verizon Communications, Inc., furnishing consumer data to credit reporting agencies, and doing business in New York.
8. Defendant VALOR INTELLIGENT PROCESSING, LLC ("Valor") is a Florida-based debt collector operating nationwide, and regularly engages in the collection of consumer debts in New York.

IV. FACTUAL ALLEGATIONS

9. Plaintiff held a Verizon Fios account that became delinquent in 2023.
10. Verizon sold the account to Valor Intelligent Processing, LLC, which is confirmed by Valor's written communications to Plaintiff. (Exhibit B)
11. Despite the sale, Verizon continued to report the account to Experian as an active, unpaid collection account with a balance of \$193, updated through April 19, 2025. (Exhibit A)
12. Plaintiff also sent a cease and desist letter to Valor and disputed the debt. (Exhibit D)
13. Plaintiff timely disputed the alleged debt and issued a cease and desist request. Valor failed to provide any meaningful validation in response. While Valor ceased further communication, it did so without complying with 15 U.S.C. § 1692g(b), which requires validation before collection efforts may continue. Valor's failure to respond left the debt unverified, unresolved, and improperly initiated under the FDCPA.
14. Valor communicated with Plaintiff in connection with the collection of the debt without prior consent or court authorization, in violation of 15 U.S.C. § 1692c(a), and disclosed information about the debt to unauthorized third parties in violation of 15 U.S.C. § 1692c(b). Valor also used language the natural consequence of which was to abuse or harass Plaintiff, including language that conveyed disgrace, in violation of 15 U.S.C. § 1692d(2).
15. Under 16 C.F.R. § 433.2 (Preservation of Consumers' Claims and Defenses), Plaintiff retains the right to assert any legal claims or defenses she would have against Verizon against Valor as the holder or assignee.
16. On or about April 25, 2025, Plaintiff formally disputed the accuracy of the tradeline and requested its deletion by email to Verizon's Executive Relations department. (Exhibit C)
17. Verizon, in emails from Executive Relations agent "Rae," stated Verizon still owned the debt and denied selling it, creating an inconsistency with Valor's claims and documentation. (Exhibit E)
18. Verizon's continued furnishing of the account to Experian is inaccurate and misleading, and in violation of the FCRA.

V. CAUSES OF ACTION

COUNT I – Violation of FCRA (15 U.S.C. § 1681s-2(a) & (b))

19. Plaintiff repeats and realleges paragraphs 1 through 18.

20. Defendant Verizon Fios furnished information it knew or should have known was inaccurate to Experian after the debt was sold.
21. Upon receiving Plaintiff's email dispute, Verizon failed to conduct a reasonable investigation and continued reporting the tradeline.
22. This conduct violated 15 U.S.C. § 1681s-2(a)(1)(A) and § 1681s-2(b).

COUNT II – Violation of FDCPA (15 U.S.C. § 1692g(b)) – Against Valor

23. Plaintiff repeats and realleges paragraphs 1 through 18.
24. Valor is a debt collector under the FDCPA and attempted to collect a consumer alleged debt.
25. Plaintiff timely disputed the alleged debt and requested validation.
26. Valor failed to validate the debt after receiving Plaintiff's cease and desist and written dispute. While Valor did not continue contacting Plaintiff directly, they also failed to provide any verification or response, in violation of 15 U.S.C. § 1692g(b).

COUNT III – Violation of FDCPA (15 U.S.C. § 1692e, § 1692f, § 1692c, § 1692d(2))

27. Valor initially misrepresented the legal status of the debt and communicated in a misleading manner. They asserted that Plaintiff owed the debt without proper validation—constitutes a violation of 15 U.S.C. §§ 1692e(2)(A), 1692e(10), 1692f, and 1692c.
28. Valor violated 15 U.S.C. § 1692c(a)(1) by communicating with Plaintiff without consent or court permission,
29. Plaintiff reserves the right to amend this complaint under § 1692c(b) if evidence shows unauthorized third-party disclosure.
30. Valor also violated 15 U.S.C. § 1692d(2) by using language that conveyed disgrace.

VI. DAMAGES

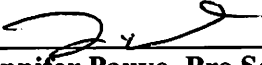
29. As a result of Defendants' conduct, Plaintiff suffered actual damages, including loss of credit opportunity, emotional distress, and reputational harm.
30. Plaintiff seeks the following relief:
 - a. From **Verizon Fios** under the FCRA: - Statutory damages up to \$1,000 - Actual damages estimated between \$3,000 to \$5,000 - Punitive damages for willful violations up to \$10,000
 - b. From **Valor Intelligent Processing** under the FDCPA: - Statutory damages up to \$1,000 - Actual damages estimated between \$2,000 to \$5,000
31. Total combined damages sought exceed **\$15,000.00**.

VII. RELIEF REQUESTED

WHEREFORE, Plaintiff respectfully requests that this Court:

A. Award actual damages under the FCRA and FDCPA; B. Award statutory damages under the FCRA and FDCPA; C. Award punitive damages under the FCRA; D. Award costs and reasonable attorney's fees under 15 U.S.C. §§ 1681n, 1681o, and 1692k; E. Issue injunctive relief requiring deletion of the Verizon tradeline; F. Grant such other relief as the Court deems just and proper.

DATED: 5/9/2025
Respectfully submitted,



Jennifer Pauyo, Pro Se
979 East 38th Street
Brooklyn, NY 11210
(917)664-5806
jpauyo72@gmail.com

demanded in the complaint.

You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

Eastern District of New York

Jennifer Pauyo,

Plaintiff,

v.

Verizon Fios (Verizon Communications Inc.),

Defendant.

SUMMONS IN A CIVIL ACTION

To: Verizon Communications Inc.

Legal Department

140 West Street

New York, NY 10007

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure.

The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Jennifer Pauyo

979 East 38th Street

Brooklyn, NY 11210

Email: jpauyo72@gmail.com

Phone: (917)664-5806

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint.

You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

EVIDENCE INDEX: EXHIBITS IN SUPPORT OF COMPLAINT

The following exhibits are attached in support of Plaintiff's Complaint:

Exhibit A: Credit Report showing Verizon tradeline

Exhibit B: Debt Collection Letter from Valor Intelligent Processing

Exhibit C: Email to Verizon Executive Relations (Dispute)

Exhibit D: Cease and Desist / Dispute Letter to Valor

Exhibit E: Email from Verizon Executive Relations denying sale of account

Exhibit F: Monetary Damages Breakdown – FCRA & FDCPA

Exhibit G: Summary of Verizon's FCRA Violations and Contradictions

EXHIBIT A

Credit Report (Experian)

[Attach corresponding document behind this cover page]

JENNIFER PAUYO

Personal & Confidential

Date Generated Apr 25, 2025

Report Number 3683-1326-54

At a Glance 18 Accounts0 Public Records0 Hard Inquiries

Personal Information

1 Names

11 Addresses

0 Employers

1 Other Records

Because your personal information is reported by you, your creditors, and other sources, it's typical to see small variations in reported personal information, like names and addresses. For security reasons, many of these items can't be disputed online, but don't worry—they don't affect your credit score.

Names

JENNIFER PAUYO

Name ID #15962

**Reinvestigation Info**

This item remained unchanged from our processing of your dispute in Dec 2024.

VERIZON**POTENTIALLY NEGATIVE****Account Info**

Account Name	VERIZON	Balance	\$193
Account Number	556257XXXXXX	Balance Updated	04/19/2025
Account Type	Utility	Recent Payment	-
Responsibility	Individual	Monthly Payment	-
Date Opened	04/27/2020	Original Balance	-
Status	Collection account. \$193 past due as of Apr 2025.	Highest Balance	-
Status Updated	Mar 2024	Terms	1 Month
		On Record Until	Apr 2030

**Payment History**

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2025	C	C	C	C	-	-	-	-	-	-	-	-
2024	-	-	C	C	C	C	C	C	C	C	C	C

C Collection

Payment history guide

Collection as of Apr 2025 to Mar 2024

This account is scheduled to continue on record until Apr 2030.

**Balance Histories**

Date	Balance	Scheduled Payment	Paid
Mar 2025	\$193	\$0	\$0 on 1/11/2024
Feb 2025	\$193	\$0	\$0 on 1/11/2024
Jan 2025	\$193	\$0	\$0 on 1/11/2024
Dec 2024	\$193	\$0	\$0 on 1/11/2024
Nov 2024	\$193	\$0	\$0
Oct 2024	\$193	\$0	\$0
Sep 2024	\$193	\$0	\$0
Aug 2024	\$193	\$0	\$0
Jul 2024	\$193	\$0	\$0
Jun 2024	\$193	\$0	\$0
May 2024	\$193	\$0	\$0
Apr 2024	\$193	\$0	\$0
Mar 2024	\$193	\$0	\$0

Additional info



Contact Info

Address PO BOX 650584,
DALLAS TX 75265

Phone Number (877) 325-5156



Comment

EXHIBIT B

Valor Collection Letter



Jenn Pauyo <jpauyo72@gmail.com>

Information regarding your Verizon account ending in 0001

2 messages

Valor Intelligent Processing <enotice@payvalor.com>
Reply-To: contact@valorvip.com
To: JENNIFER PAUYO <jpauyo72@gmail.com>

Wed, May 8, 2024 at 3:35 PM

You can now manage your account online at <https://payvalor.com/?i=QUWST>

Valor Intelligent Processing, LLC
PO Box 959
Orange Park, FL 32073

1 (844) 724-5158 from 8am to 8 pm, EST M-F
<https://www.valorvip.com>

05/08/2024
To: JENNIFER PAUYO
200 N 5TH ST FLR 2 APT 2
HARRISON, NJ 07029-1456

Valor Reference Number: 14454759

Valor Intelligent Processing is a debt collector. We are trying to collect a debt that you owe to Verizon. We will use any information you give us to help us collect the debt.

Our information shows:

You had an account with Verizon with an account number 5562572710001

As of March 06, 2024, you owed \$193.76

Between March 06, 2024 and today:

- You were charged this amount in interest: \$0.00
- You were charged this amount in fees: \$0.00
- You paid or were credited this amount toward the debt: \$0.00

Total amount of the debt now: \$193.76

How can you dispute the debt?

- Call or write to us by June 28, 2024, to dispute all or part of the debt. If you do not, we will assume that our information is correct.
- If you write to us by June 28, 2024, we must stop collection on any amount you dispute until we send you information that shows you owe the debt. You may use the form below or write to us without the form. You may also include supporting documents. We accept disputes electronically at contact@valorvip.com.

What else can you do?

- Write us to ask for the name and address of the original creditor, if different from the current credit creditor. If you write by June 28, 2024, we must stop collection until we send you that information. You may use the below portion of this letter, or write to us separately at PO Box 959, Orange Park, FL 32076. We also accept such requests electronically at contact@valorvip.com.
- Go to <https://www.cfpb.gov/debt-collection> to learn more about your rights under federal law.
- Contact us about your payment options.

Mail this form to:

Valor Intelligent Processing
PO Box 959
Orange Park, FL 32067

To: JENNIFER PAUYO
200 N 5TH ST FLR 2 APT 2
HARRISON, NJ 07029-1456

How do you want to respond?

- ☐ I want to dispute the debt because
- ☐ This is not my debt
- ☐ The amount is wrong
- ☐ Other (please describe on reverse or attach additional information)
- ☐ I want you to send me the name and address of the Original Creditor
- ☐ I am enclosing this amount \$ _____

Make checks payable to Valor Intelligent Processing. Include Valor Reference Number.

Important Information. We are required under certain State and Local Laws to notify consumers of those States or Localities of the following rights. This list does not contain a complete list of the rights consumers have under Federal, State, or Local Laws.

COLORADO RESIDENTS ONLY: FOR INFORMATION ABOUT THE COLORADO FAIR DEBT COLLECTION PRACTICES ACT, SEE [HTTPS://COAG.GOV/OFFICE-SECTIONS/CONSUMER-PROTECTION/CONSUMER-CREDIT-UNIT/COLLECTION-AGENCY-REGULATION/](https://coag.gov/office-sections/consumer-protection/consumer-credit-unit/collection-agency-regulation/). This agency's Colorado resident office is located at 7200 S Alton Way, Suite B180 Centennial, CO 80012 and has a phone number of 303-768-0200. A consumer has the right to request in writing that a debt collector or collection agency cease further communication with the consumer. A written request to cease communication will not prohibit the debt collection agency from taking any other action authorized by law to collect the

MASSACHUSETTS RESIDENTS ONLY:

NOTICE OF IMPORTANT RIGHTS YOU HAVE THE RIGHT TO MAKE A WRITTEN OR ORAL REQUEST THAT TELEPHONE CALLS REGARDING YOUR DEBT NOT BE MADE TO YOU AT YOUR PLACE OF EMPLOYMENT. ANY SUCH ORAL REQUEST WILL BE VALID FOR ONLY TEN DAYS UNLESS YOU PROVIDE WRITTEN CONFIRMATION OF THE REQUEST POSTMARKED OR DELIVERED WITHIN SEVEN DAYS OF SUCH REQUEST. YOU MAY TERMINATE THIS REQUEST BY WRITING TO THE DEBT COLLECTOR.

MINNESOTA RESIDENTS ONLY: This collection agency is licensed by the Minnesota Department of Commerce.

NORTH CAROLINA RESIDENTS ONLY: North Carolina Permit Number 113797

TENNESSEE RESIDENTS ONLY: This collection agency is licensed by the Collection Service Board of the Tennessee Department of Commerce and Insurance.

CALIFORNIA RESIDENTS ONLY: The State Rosenthal Fair Debt Collection Practices Act and the Federal Fair Debt Collection Practices Act require that, except under unusual circumstances, collectors may not contact you before 8 a.m. or after 9 p.m. They may not harass you by using threats of violence or arrest or by using obscene language. Collectors may not use false or misleading statements or call you at work if they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other than your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or enforce a judgment. For more information about debt collection activities, you may contact the Federal Trade Commission at 1-877-FTC-HELP OR WWW.FTC.GOV.

"You may request records showing the following: (1) that Valor Intelligent Processing has the right to seek collection of the debt; (2) the debt balance, including an explanation of any interest charges and additional fees; (3) the date the debt became delinquent or the date of the last payment; (4) the name of the creditor and the account number associated with the debt; (5) the name and last known address of the debtor as it appeared in the creditor's records prior to assignment of the debt; and (6) the names of all persons or entities other than the debt collector to which the debt has been assigned, if applicable. You may also request from us a copy of the contract or other document evidencing your agreement to the debt. A request for these records may be addressed to: PO Box 959 Orange Park, FL 32067 or contact@valorvip.com.

This is an attempt to collect a debt, and any information obtained will be used for that purpose

14454759

[Unsubscribe - Unsubscribe Preferences](#)

Jenn Pauyo <jpauyo72@gmail.com>
To: contact@valorvip.com

Thu, Jun 27, 2024 at 6:27 PM

To whom it may concern:



Jenn Pauyo <jpauyo72@gmail.com>

Information regarding your Verizon account ending in 0001

Jenn Pauyo <jpauyo72@gmail.com>
To: contact@valorvip.com

Thu, Jun 27, 2024 at 6:27 PM

To whom it may concern:

Attached is a cease and desist letter.

Best regards,
Jennifer Pauyo

[Quoted text hidden]

3 attachments

Scan2024-06-27_182148_000.jpg
1036K



Scan2024-06-27_182148_002.jpg
723K

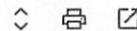


Scan2024-06-27_182148_001.jpg
906K

EXHIBIT C

Dispute Email to Verizon

Verizon Executive Relations (CASE 3202954) Verizon Dispute x



Verizon Wireless Executive Relations <cersWEExecutiveRelations@verizonwireless.com>

Fri, Apr 25, 5:02 PM (12 days ago)



to me ▾

Dear Jennifer Pauyo,

My name is Michelle, and I work in the Executive Office of Verizon. I received your Notice of Dispute and wish to speak with you to address your concern.

I would first like to apologize for any inconvenience that you may have experienced. I truly appreciate the opportunity to resolve your concerns.

Let me know the best time to contact you, as well as the preferred method of contact. Please do not hesitate to contact me directly at 800-779-2067 Ext. 2140012 Monday through Friday between the hours of 9:00 AM - 6:00 PM Eastern. I look forward to speaking to you soon.

Regards,
Michelle

Verizon Executive Relations

verizon

Jenn Pauyo <jpauyo72@gmail.com>

to cersWEExecutiveRelations ▼

Good morning Michelle,

Thank you for the response. My availability for today is after 1pm-4pm. I look forward hearing from you.

Tuesday 12noon- 4pm

Wednesday after 3pm

Thursday after 2pm

All the best,

Jennifer Pauyo

On Apr 25, 2025, at 5:02 PM, Verizon Wireless Executive Relations <cersWEExecutiveRelations@verizonwireless.com> wrote:

...



Verizon Wireless Executive Relations

to me ▾

Apr 28, 2025, 10:28 AM (9 days ago)



Hello,

Thank you for responding. I do have question I'd like to ask prior to the call. Are your concerns regarding a Verizon Wireless account or a Verizon Fios account? I am with Verizon Wireless with no access to Verizon Fios accounts. I want to ensure your concerns are being handled by the correct team.

Regards,

Michelle

Verizon Executive Relations

verizon

Jenn Pauyo <jpauyo72@gmail.com>

to Verizon ▼

Mon, Apr 28, 10:43 AM (9 days ago)



Hi Michelle,

Thank you for your email. After reviewing the account details, I can confirm that this dispute concerns a ****Verizon Fios account****. I would appreciate it if you could immediately forward this matter to the appropriate Verizon Fios Executive Relations representative or provide their direct contact information so I can resolve this issue promptly. This matter involves significant Fair Credit Reporting Act violations and remains time-sensitive.

Thank you for your assistance.

Best regards,
Jennifer Pauyo
(917)664-5806

...

Apr 28, 2025, 11:04 AM (9 days ago)



Verizon Wireless Executive Relations

to me ▾

Hello,

Thank you for verifying the account. Your complaint will be forwarded to the relevant team, who will contact you with their details within 24 to 48 business hours. We appreciate your understanding.

Regards,
Michelle

Verizon Executive Relations

verizon

EXHIBIT D

Cease and Desist to Valor

June 24, 2024

Jennifer Pauyo
Valor Reference Number: 14454759

Valor Intelligent Processing, LLC
PO Box 959
Orange Park, FL 32073

**Validation of a Debt Request Pursuant to 15 USC §1692gb, Cease and Desist
Pursuant 15 USC 1692 (C) (c)**

I recently received communication from you attempting to collect the above-listed alleged debt. Your initial communication to me in attempt to collect the alleged debt was within 30 days ago.

Please be advised that I hereby dispute the validity of the alleged debt listed above in its entirety. Further, I request verification of the alleged debt, specifically, a copy of a contract or agreement. Said contract or agreement must be with the original creditor and signed by all parties involved. You are illegally attempting to collect the above-listed alleged debt and money that I do not owe.

Cease and desist all collection activity, including all reporting to consumer reporting agencies. Promptly request deletion of any and all prior reporting made to any consumer reporting agencies. If you comply with my requests above within 14 days, then you are excused from verification.

Furthermore pursuant 15 USC §1692(e)(3) False or misleading representations

A debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt. Without limiting the general application of the foregoing, the following conduct is a violation of this section:

The false representation or implication that any individual is an attorney or that any communication is from an attorney.

You Valor Intelligent Processing, LLC have no right under the law to send me any type of communication whatsoever. Cease and Desist all communication immediately.

Furthermore You Valor Intelligent Processing, LLC are attempting to collect an alleged debt where the so called original creditor has falsely represent the character other Violations under 15 USC 1692 e that you are implementing yourself.

Violation:

15 USC 1692b(5)

15 USC 1692(2)(A)

15 USC 1692c(3)

- Agreement with your client that grants Valor Intelligent Processing, LLC the authority to collect this alleged debt.
- Signed agreement Debtor has made with Debt Collector, or other verifiable proof Debtor has a contractual obligation to pay Debt collector.
- Any agreement that bears the signature of Debtor, wherein agreed to pay Creditor.
- All statements while this account was open.
- Have any insurance claims been made by any creditor regarding this account?
 - Yes
 - No
- Have any Judgements been obtained by any creditor regarding this account?
 - Yes
 - No

Please provide me the name and address of the bonding agent for Valor Intelligent Processing, LLC, in case legal action becomes necessary:

Date: _____

Authorized Signature of Creditor

You must return this completed form along with copies of all requested information, assignments or other transfer agreements, which would establish your right to collect this alleged debt within 30 calendar days from the date of receipt of this letter.

Your Claim cannot and WILL NOT be considered if any portion of this form is not completed and returned with copies of all requested documents. This is a request for Validation made pursuant to the Fair Debt Collection Practices Act.

Please allow 30 calendar days for processing after I receive this information.

Thank You.

15 USC 1692(6)(B)

15 USC 1692(9)

15 USC 1692(10)

15 USC 1692(11)

This letter is CCed to the Bureau of Consumer Protection Finance as evidence may be provided to the Consumer Financial Protection Bureau ("CFPB"). The CFPB is authorized to investigate this fully matter and receive any related information herein. Be advised, if you fail to comply with this demand letter, I may turn the matter over to an attorney).

Note I am a very litigious consumer, and I will proceed with legal action for all my consumer rights violations under this subchapter plus all remedies and actual damages as a result of your failure pursuant 15 USC 1692K.

If your offices are able to provide the proper documentation as requested in the following Declaration, I will require at least 30 days to investigate this information, during which time **all collection activity shall CEASE and Desist**. Also, during this validation period, if any action is taken which could be considered detrimental to any of my credit reports, I will consult with my legal counsel for suit.

This includes any listing of information to a credit reporting repository/ agency that could be inaccurate or invalidated.

If your office fails to respond to this validation request within 10 days from the date of your receipt, all references to this account must be deleted and completely removed from my consumer report, and a copy of such deletion request shall be sent to me immediately.

Sincerely,


Jennifer Pauyo

The Following information is required. Please fill out the form below in its entirety.

1. Name and address of Alleged creditor:
2. Name on file of alleged debtor:
3. Alleged Account #:
4. Address on file for alleged debtor:
5. Amount of alleged debt:
6. Date this alleged became payable:
7. Date of original charge off or delinquency:
8. Was this debt assigned to a debt collector or purchased? ____ No ____ Yes
9. Amount Paid if debt was purchased:
10. Commission for debt if collection efforts are successful:

Please attach copies of the following:

EXHIBIT E

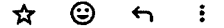
Verizon Emails (Rae)

Case Acknowledgement (Need More information) (CASE3203524) [Verizon Dispute](#) x



VCM Agency <cersVCMAgency@verizonwireless.com>
to me ▾

Mon, Apr 28, 12:46 PM (9 days ago)



April 28, 2025

Telephone Number:

Dear Jennifer Pauyo:

Thank you for your Email complaint, which we received on 4/28/25 concerning the credit reporting of your final Fios bill. Verizon is committed to providing quality customer service and appreciates the opportunity to review your concerns.

I sincerely apologize for the inconvenience you may have experienced. I would like to investigate this issue further. Up on looking at this account I can see that there was balance that was sent to collections, however I do need some additional information please to investigate this further. Why would you be disputing the Final balance on your Fios account?

Thank you again for taking the time to express your concerns. Please do not hesitate to contact me directly at 833-888-6121 Extension 4440121, Monday through Friday between the hours of 08:00 am-04:30 pm EST. To ensure your call is routed correctly, please select Option 2, then Option 1, and dial extension when prompted. You can also reply directly to this email. I look forward to working with you on this matter.

Sincerely,

Rae

Verizon Executive Relations Team

Rae

Verizon Executive Relations Team

Monday - Friday: 8:00 a.m. to 5:00 p.m. ET

verizon

Jenn Pauyo <jpauyo72@gmail.com>

to VCM ▾

Mon, Apr 28, 1:24 PM (9 days ago)



Hi Rae,

Thank you again for your prompt response regarding Case 3203524.

Attached for your review are the documents I previously submitted with my initial dispute, including:

- A detailed Notice of Dispute citing the relevant Fair Credit Reporting Act violations,
- A copy of my Experian credit report highlighting the inaccurate Verizon Fios tradeline,
- Proof of prior dispute communication with Valor Intelligent Processing,
- Proof of my identity.

As mentioned, I am disputing the continued reporting of the account as an active balance after the debt was sold, which constitutes a violation of the FCRA (15 U.S.C. §1681s-2(a)).

I am requesting:

- Immediate deletion of the Verizon Fios tradeline from all consumer reporting agencies (Experian, Equifax, TransUnion),
- A settlement payment of \$10,000.00 for statutory and actual damages related to this violation.

Please review the attached documentation and let me know how you would like to proceed. I look forward to resolving this promptly.

Sincerely,

Jennifer Pauyo

DOB: [07/02/1984

SSN: XXX-XX-6514

(917)664-5806

jpauyo72@gmail.com

...

8 Attachments • Scanned by Gmail ⓘ



PDF Valor.pdf



PDF Valor1.pdf



PDF DebtCollector se...



PDF DebtcollectorVal...



PDF DebtCollectorVal...



PDF Annual Credit Re...



RE: Re: Case Acknowledgement (Need More information) (CASE3203524) (CASE 3203524) Verizon Dispute



VCM Agency
to me

Dear Ms. Jennifer Pauyo,

Apr 30, 2025, 12:51 PM (7 days ago) ☆ ☹ ↶ !

I have performed a full review of your account ending in 271-0001. Please be assured that your account has not been sold to Valor Intelligent Processing, LLC. They were engaged by Verizon in an effort to help collect this debt. Verizon is the company reporting this account to the credit bureaus. I would like to share my additional findings:

6/6/23 bill included new charges of \$55.98
6/27/23 full payment received of \$55.98

7/6/23 bill included new charges of \$55.98
No payment received

8/6/23 bill included past due balance(from 7/6/23 statement of \$55.98) + new charges of \$65.98 for a total of \$121.96
Payment received 8/25/23 for \$55.98, which covered the 7/6/23 statement.
** Auto pay was removed 08/02/23 causing a loss of the \$10 auto pay discount. The auto payment on 7/27/23 was not processed because the card was declined.

9/6/23 bill included a past due of \$65.98 plus new charges of \$122.77 equaling a total of \$188.75. This included \$ 50.00 for the restoral fees on 8/25/23 to get the services restored after they were suspended for non-payment, the normal month of September of \$63.77, and a \$9.00 late charge.
** There was a credit given of \$2.17 for one day of service while the services were suspended.

10/6/23 bill included the past due amount of \$188.75. This bill provided a credit of -\$21.99 for 10 days of service (9/27/23-10/6/23) due to the account being disconnected on 9/27/23, due to non payment. There was a \$9 late charge added to this bill for a total credited balance of -\$12.99. This brings the account total to \$175.76

11/6/23 the bill included the past due amount of \$175.76 plus a \$9 late fee. This brings the overall account total to \$184.76

12/6/23 the bill included the past due balance of \$184.76 plus a \$9 late fee. This brings the total account balance to \$193.76

1/6/24 the bill included the past due amount of \$193.76 plus the new charges of \$186.59. The new charges are due to the equipment not being returned at this point. This brings the overall account balance to \$380.35

2/6/24 the bill includes the past due balance of \$193.86. This total is because the equipment charges of \$186.59 that appeared on the 1/6/24 statement have been removed since the equipment was returned.

There are no further billing statements after February 2023. Based on the above, Verizon has appropriately credit reported this account. The balance of 193.76 is correct and due on the account. It covers the service from 8/7/23-9/27/23 To recap, there is no credit due and the balance is valid. Please submit payment at your earliest convenience.

Thank you,

Rae

Verizon Executive Relations Team

Monday - Friday: 8:00 a.m. to 5:00 p.m. ET

verizon

-----Original Message-----

From: jpauryo72@gmail.com

Sent: 04/28/2025 12:27 CDT

To: CERS VCM Agency

Cc:

Subject: Re: Case Acknowledgement (Need More Information) (CASE3203524)

Hi Rae,

Thank you again for your prompt response regarding Case 3203524.

Attached for your review are the documents I previously submitted with my initial dispute, including:

- A detailed Notice of Dispute citing the relevant Fair Credit Reporting Act violations,
- A copy of my Experian credit report highlighting the inaccurate Verizon Fios tradeline,
- Proof of prior dispute communication with Valor Intelligent Processing,
- Proof of my identity.

As mentioned, I am disputing the continued reporting of the account as an active balance after the debt was sold, which constitutes a violation of the FCRA (15 U.S.C. 1681s-2(a)).

I am requesting:

- Immediate deletion of the Verizon Fios tradeline from all consumer reporting agencies (Experian, Equifax, TransUnion),
- A settlement payment of \$10,000.00 for statutory and actual damages related to this violation.

Please review the attached documentation and let me know how you would like to proceed. I look forward to resolving this promptly.

Sincerely,

Jennifer Pauryo

DOB: 07/02/1984

SSN: XXX-XX-6514

(817)664-5808

jpauryo72@gmail.com

April 28, 2025

Telephone Number:

Dear Jennifer Pauyo:

Thank you for your Email complaint, which we received on 4/28/25 concerning the credit reporting of your final Fios bill. Verizon is committed to providing quality customer service and appreciates the opportunity to review your concerns.

I sincerely apologize for the inconvenience you may have experienced. I would like to investigate this issue further. Up on looking at this account I can see that there was balance that was sent to collections, however I do need some additional information please to investigate this further. Why would you be disputing the Final balance on your Fios account?

Thank you again for taking the time to express your concerns. Please do not hesitate to contact me directly at 833-888-6121 Extension 4440121, Monday through Friday between the hours of 08:00 am-04:30 pm EST. To ensure your call is routed correctly, please select Option 2, then Option 1, and dial extension when prompted. You can also reply directly to this email. I look forward to working with you on this matter.

Sincerely,

Rae

Verizon Executive Relations Team

Rae

Verizon Executive Relations Team

Monday - Friday: 8:00 a.m. to 5:00 p.m. ET

verizon

Jenn Pauyo <jpauyo72@gmail.com>

to VCM ▾

April 30, 2025

Hi Rae,

Thank you for your detailed response. To clarify, my dispute is not about the billing activity itself. It is about Verizon Fios' decision to continue reporting this account as an open collection tradeline with an outstanding balance — **despite the fact that it was assigned to a third-party debt collector, Valor Intelligent Processing.**

Under the Fair Credit Reporting Act (15 U.S.C. §1681s-2), Verizon has a duty to furnish only accurate and non-misleading information to credit reporting agencies. The continued reporting of this tradeline — without clarification that the debt is disputed and was assigned for third-party collection — constitutes inaccurate, incomplete, and potentially deceptive reporting under federal law.

You also did not respond to my request for deletion or the proposed settlement offer. I remain open to resolving this without litigation.

To resolve this matter:

- I request that Verizon delete the Verizon Fios tradeline from all credit reporting agencies (Experian, Equifax, and TransUnion); and
- I request a settlement payment of \$10,000 for the statutory and actual damages caused by this violation.

Please confirm how Verizon intends to proceed within 5 business days.

Sincerely,

Jennifer Pauyo

(917)664-5806

jpauyo72@gmail.com

...



VCM Agency
to me ▾

Apr 30, 2025, 2:43 PM (7 days ago)



Good afternoon Jennifer Pauyo,

Verizon has reported accurate information regarding your account to the appropriate credit bureaus. The credit reporting status will not be changed until payment is received.

There is no compensation due regarding this matter.

Please be advised this is Verizon's final business decision.

Thank you,

Rae

Verizon Executive Relations Team

Monday - Friday: 8:00 a.m. to 5:00 p.m. ET

verizon

Jenn Pauyo <jpauyo72@gmail.com>
to VCM ▾

Apr 30, 2025, 2:34 PM (7 days ago)



April 30, 2025

Subject: Final Notice Before Litigation – FCRA Dispute / Account Ending in 271-0001

Dear Rae,

This letter serves as my final written notice prior to initiating litigation against Verizon Fios for violations of the Fair Credit Reporting Act (FCRA), 15 U.S.C. § 1681s-2.

As previously stated, Verizon has continued to report an account that was assigned to a third-party debt collector (Valor Intelligent Processing) as an active collection tradeline. Despite my written dispute and supporting documentation, Verizon failed to:

- Conduct a reasonable investigation as required under 15 U.S.C. § 1681s-2(b),
- Accurately update or delete the disputed tradeline,
- Mark the tradeline as "disputed" with consumer reporting agencies,
- Cease furnishing misleading and incomplete information.

Furthermore, your decision to require payment before updating inaccurate information constitutes coercive conduct and misrepresentation of a debt's legal status.

This is a clear violation of federal consumer protection laws. I have fully documented the dispute, your responses, and the resulting harm to my credit and peace of mind.

I am providing Verizon with ****five (5) calendar business days**** from the date of this email to:

1. Permanently delete the Verizon Fios tradeline from all consumer reporting agencies, and
2. Offer a settlement in the amount of ****\$10,000**** to resolve statutory and actual damages stemming from this ongoing violation.

If no response or corrective action is received by May 5, 2025. I will immediately file a federal lawsuit in the United States District Court for the Eastern District of New York, and pursue all damages and remedies available under federal law.

This will also be followed by complaints to the Consumer Financial Protection Bureau (CFPB), the New York Attorney General's Office, and any additional regulatory authorities deemed appropriate.

Please govern yourselves accordingly.

Sincerely,
Jennifer Pauyo
(917)664-5806
jpauyo72@gmail.com

EXHIBIT F

Damages Breakdown Chart

EXHIBIT F

Monetary Damages Breakdown – FCRA (Verizon) & FDCPA (Valor)

This chart outlines the estimated monetary damages sought under the Fair Credit Reporting Act (FCRA) against Verizon and the Fair Debt Collection Practices Act (FDCPA) against Valor Intelligent Processing, LLC.

Category	Verizon (FCRA)	Valor (FDCPA)
Statutory Damages	\$1,000 max (15 U.S.C. §1681n)	\$1,000 max (15 U.S.C. §1692k)
Actual Damages	\$3,000 - \$5,000 (emotional distress, credit harm)	\$2,000 - \$5,000 (distress, harassment)
Punitive Damages	\$5,000 - \$10,000 (willful violation)	N/A (no punitive damages under FDCPA)
Total Estimated Range	\$9,000 - \$16,000	\$3,000 - \$6,000

FCRA_and_FDCPA_Damages_Breakdown

Violation Type	Estimated Range (USD)	Explanation
FCRA - Statutory Damages	\$0 - \$1,000	Set by 15 U.S.C. § 1681n for willful violations
FCRA - Actual Damages	\$1,000 - \$5,000	Includes emotional distress, credit denial, etc.
FCRA - Punitive Damages	\$5,000 - \$10,000+	For willful violations at court's discretion
FDCPA - Statutory Damages	\$0 - \$1,000	Set by 15 U.S.C. § 1692k(a)(2)(A) (per lawsuit)
FDCPA - Actual Damages	\$1,000 - \$5,000	For harassment, improper contact, failure to validate

EXHIBIT G

TITLE: Summary of FCRA Violations by Verizon Fios

Plaintiff: Jennifer Pauyo

Defendant: Verizon Fios (Verizon Communications Inc.)

Attached to: Complaint for Damages and Injunctive Relief

Exhibit Purpose: To outline specific FCRA violations committed by Verizon Fios, including misrepresentation, failure to correct inaccurate reporting, and actions classified as ultra vires under federal law.

EXHIBIT G – SUMMARY OF FCRA VIOLATIONS BY VERIZON FIOS

Plaintiff: Jennifer Pauyo

Defendant: Verizon Fios (Verizon Communications Inc.)

Statute: Fair Credit Reporting Act (FCRA), 15 U.S.C. § 1681 et seq.

I. Overview of Violations

Verizon violated multiple provisions of the Fair Credit Reporting Act by furnishing and continuing to report inaccurate information to credit reporting agencies (CRAs) after Plaintiff's formal dispute. These actions directly contradict Verizon's duties as a furnisher under the FCRA.

II. Specific FCRA Violations

1. 15 U.S.C. § 1681s-2(a)(1)(A)

- - Verizon furnished inaccurate information to Experian by reporting a \$193 balance on a tradeline that was already sold or assigned to Valor Intelligent Processing.

2. 15 U.S.C. § 1681s-2(b)(1)(A-E)

- - After receiving Plaintiff's formal dispute via email to Executive Relations (Exhibit C), Verizon failed to reasonably investigate or correct the inaccurate tradeline (Exhibit A).
- - Verizon's internal representative (Rae) confirmed inconsistencies between Verizon's claim of account ownership and Valor's collection activity (Exhibit E).

III. Supporting Exhibits

- Exhibit A – Experian Credit Report showing \$193 Verizon balance post-assignment
- Exhibit C – Dispute email sent to Verizon Executive Relations
- Exhibit E – Email response from Verizon denying sale while Valor attempted collection

IV. Summary

Verizon's continued furnishing of inaccurate tradeline data, failure to conduct a reasonable

investigation after notice, and contradictory internal responses constitute multiple violations of the Fair Credit Reporting Act. These actions caused Plaintiff harm to credit, confusion, and reputational damage.

Verizon's statement that it retained ownership of the account directly contradicts the collection actions and communication by Valor Intelligent Processing. This inconsistency constitutes a misrepresentation of the account's status, and supports Plaintiff's claim that Verizon knowingly furnished inaccurate information to credit bureaus in violation of the FCRA.

Verizon's actions may also be classified as ultra vires — acts taken beyond the legal scope of their authority. By continuing to furnish tradeline information on an account they no longer lawfully controlled, and denying its sale despite a third-party collector's involvement, Verizon acted outside their authorized powers as a furnisher under the FCRA.

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

Eastern District of New York

Jennifer Pauyo,

Plaintiff,

v.

Verizon Fios (Verizon Communications Inc.),

Defendant.

SUMMONS IN A CIVIL ACTION

To: Verizon Communications Inc.

Legal Department

140 West Street

New York, NY 10007

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure.

The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Jennifer Pauyo

979 East 38th Street

Brooklyn, NY 11210

Email: jpauyo72@gmail.com

Phone: (917)664-5806

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint.

You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

PROOF OF SERVICE

(This section is for use by the person who serves the summons)

I declare under penalty of perjury that I served the summons and complaint on:

Name of individual served: _____

Date of service: _____

Method of service (e.g., certified mail, personal delivery): _____

Signature of Server: _____ Date: _____

Printed Name: _____

Address: _____

City, State, Zip: _____

UNITED STATES DISTRICT COURT

Eastern District of New York

Jennifer Pauyo,

Plaintiff,

v.

Valor Intelligent Processing, LLC,

Defendant.

SUMMONS IN A CIVIL ACTION

To: Valor Intelligent Processing, LLC
c/o Corporation Service Company (Registered Agent)
1201 Hays Street
Tallahassee, FL 32301-2525

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure.

The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Jennifer Pauyo
979 East 38th Street
Brooklyn, Ny 11210
Email:jpauyo72@gmail.com
Phone: (917)664-5806

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint.

You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

JS 44 (Rev. 04/21) CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law...

I. (a) PLAINTIFF

Jennifer Pauyo
979 East 38th Street
Brooklyn, NY 11210

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF

Kings (Brooklyn), NY

(c) ATTORNEYS (Firm Name, Address, and Telephone Number)

Pro Se
Jennifer Pauyo
Email: jpauyo72@gmail.com
Phone: (917)664-5806

II. BASIS OF JURISDICTION

☒ 3. Federal Question (U.S. Government Not a Party)

III. CITIZENSHIP OF PRINCIPAL PARTIES

☒ 1. Citizen of This State (Plaintiff)

☐ 2. Citizen of Another State (Defendants)

IV. NATURE OF SUIT

☒ 480 Consumer Credit

☒ 890 Other Statutory Actions

V. ORIGIN

☒ 1. Original Proceeding

VI. CAUSE OF ACTION

Fair Credit Reporting Act violations - 15 U.S.C. § 1681 et seq.

Fair Debt Collection Practices Act - 15 U.S.C. § 1692 et seq.

Continued reporting and unlawful debt collection activity following dispute and debt sale.

VII. REQUESTED IN COMPLAINT

☒ Monetary Relief

☒ Injunctive Relief

☐ Jury Demand: Yes

Clerk copies

VIII. RELATED CASE(S) IF ANY (See instructions):

N/A

DATE: May 07, 2025

SIGNATURE OF ATTORNEY OF RECORD

/s/ Jennifer Pauyo